

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) No.
)
APPROXIMATELY THIRTY)
THOUSAND, SIX HUNDRED DOLLARS)
(\$30,600.00) U.S. CURRENCY,)
)
Defendant.)

VERIFIED COMPLAINT OF FORFEITURE

Comes now plaintiff, United States of America, by and through its attorneys, Carrie Costantin, Acting United States Attorney for the Eastern District of Missouri, and Stephen Casey, Assistant United States Attorney, for said district, and in a civil cause of action for forfeiture respectfully states as follows:

1. In this *in rem* civil action the United States seeks forfeiture of certain property, currently in the possession and custody of the plaintiff pursuant to the provisions of Title 21, United States Code, Section 881.
2. Subject Matter Jurisdiction of this Court is based on Title 28, United States Code, Sections 1345, 1355(a), and Title 21, United States Code, Section 881. In rem jurisdiction is based on Title 28, United States Code, Section 1355. Venue is proper in this district pursuant to Title 28, United States Code, Sections 1355 &1395 and Title 21, United States Code, Section 881(j).
3. The defendant property was furnished or intended to be furnished in exchange for controlled substances in violation of the Controlled Substances Act, Title 21, United States Code,

Section 801 et seq., was proceeds traceable to such an exchange, and was used or intended to be used to facilitate such an exchange. The defendant property is therefore subject to forfeiture to the United States of America, under the provisions of Title 21, United States Code, Section 881(a)(6).

4. The defendant property was seized in the Eastern District of Missouri and is now, and during the pendency of this action will be in the jurisdiction of this court.

5. Investigators have utilized source information, law-enforcement surveillance operations, statements made by individuals as part of this investigation, and other investigative procedures.

6. On or about April 5, 2017, the defendant property was seized from Christopher Owens by the United States Postal Inspection Service (“USPS”). The plaintiff alleges the defendant property is subject to forfeiture and for its reasons, states as follows:

7. On April 4, 2017, Inspectors were conducting a routine review of incoming Priority Mail Express packages. While reviewing the packages, Inspectors observed a package (hereafter, the “Subject Package”) which was mailed on April 3, 2017, from the Willits, California post office. The Subject Package was addressed to Matt Taylor, 606 West Cooper Rd., Madison, Missouri with a return address of S + K Automotive, 301 Kunzler Ranch Rd., Uriah, California.

8. On April 4, 2017, Inspectors obtained a Federal Search Warrant for the Subject Package. The Subject Package revealed 16 pounds, 14.6 ounces of marijuana.

9. On April 4, 2017, Inspectors met with the Missouri State Highway Patrol for the purpose of a controlled delivery. The marijuana was placed back inside the Subject Package and resealed. Inspectors posed as a USPS letter carrier and delivered the Subject Package. A white

male accepted the Subject Package and took it into the shed at the rear of the residence.

10. On April 4, 2017, investigators in Northeast Missouri executed a state search warrant for 606 West Cooper Rd., Madison, Missouri. The residence is owned by an Andrea Farris. During the search, which was joined by Inspectors, the unopened Subject Package was placed off to the side of the shed, covered with a large cloth/tarp.

11. During the search, Inspectors observed a black Kia Soll, California license plate 7TCG789, parked on the property. The Kia Soll was rented from Hertz Vehicles LLC in California, by Misty Owens on April 1, 2017. The rental contract from Hertz shows a rental agreement from April 1, 2017 to May 1, 2017. Upon information and belief, Christopher Owens, present at the scene at the time of the search warrant, drove the Kia Soll from California. Inside the Kia Soll, Inspectors located and seized \$30,600.00 U.S. currency ("defendant property").

13. The only people who could have any possible interest in the defendant property is Matt Taylor, Christopher Owens, Misty Owens and Andrea Farris.

14. By reason of these premises, the defendant property is subject to forfeiture to the United States, pursuant to the provisions of Title 21, United States Code, Section 881.

WHEREFORE, Plaintiff prays that a Warrant for Arrest be issued for the defendant property and the defendant property be condemned and forfeited to the United States of America, in accordance with the provisions of law; and that the plaintiff be awarded its costs in this action, and have such other relief as provided by law and the nature of the case may require.

Respectfully submitted,

CARRIE COSTANTIN
Acting United States Attorney

/s/ Stephen Casey
STEPHEN CASEY, #58879MO
Assistant United States Attorney
111 South Tenth Street, 20th Floor
St. Louis, Missouri 63102

VERIFICATION

I, Inspector, John R. Jackman, hereby verify and declare under penalty of perjury that I am an Inspector with the United States Postal Inspection Service, that I have read the foregoing Verified Complaint in rem and know the contents thereof, and that the matters contained in the Verified Complaint are true to my own knowledge, except that those matters herein stated to be alleged on information and belief and as to those matters I believe them to be true.

The sources of my knowledge and information and the grounds of my belief are the official files and records of the United States, information supplied to me by other law enforcement officers, as well as my investigation of this case, together with others, as an Inspector of the United States Postal Inspection Service.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 7/5/2017
(date)


John R. Jackman
Inspector
United States Postal Inspection Service